MGM Brakes Superfund Site
Cloverdale, California

EXPLANATION OF SIGNIFICANT DIFFERENCES

I. INTRODUCTION

The MGM Brakes Superfund Site (Site) is an approximately 5-acre property located at the southwestern corner of the intersection of South Cloverdale Boulevard and Santana Drive in Cloverdale, Sonoma County, California. The United States Environmental Protection Agency (EPA) added the Site to the National Priorities List (NPL) on September 8, 1983. EPA is the lead agency; the California Department of Toxic Substances Control (DTSC) and the California Regional Water Quality Control Board (RWQCB) are the support agencies.

On September 29, 1988, EPA signed a Record of Decision (the "1988 ROD") which selected soil and groundwater remedies for the Site. On August 14, 1995, EPA signed an Explanation of Significant Differences (the "1995 ESD") to modify the originally selected remedies in the 1988 ROD.

The 1995 ESD added the requirement for land use restrictions to the soil remedy. Based on a re-evaluation of potential risks to human health and the environment during the 2013 five year review process, EPA has determined that land use restrictions are no longer needed to achieve protectiveness at the Site. EPA is issuing this ESD to clarify that land use restrictions are no longer a component of the Superfund remedy at the Site.

EPA has developed this ESD in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendment and Reauthorization Act of 1986, and the National Oil and Hazardous Substances Contingency Plan (NCP) 40 C.F.R. Section 300.435(c)(2)(i).

40 C.F.R. Section 300.825(a)(2) requires that this ESD and all documents that form the basis for the ESD will become part of the MGM Brakes Superfund Site Administrative Record File. The Administrative Record File is available for public review at these locations:

Sonoma County Public Library
211 E Street
Santa Rosa, CA 95404
(707) 545-0831

U.S. Environmental Protection Agency, Region 9
Regional Records Center
75 Hawthorne Street, Room 3110
San Francisco, CA 94105
(415) 947-8717

II. SITE HISTORY

The Site is located in southern Cloverdale, California. The MGM Brakes facility manufactured and cast aluminum brake components for large vehicles between 1965 and 1982. Wastewater containing polychlorinated biphenyls (PCBs) was discharged into the field south of the plant from 1965 to 1972. From 1972 until 1981, the use of ethylene glycol on the Site is believed to have caused PCBs already in the soil to further migrate horizontally and vertically.

In 1981, the RWQCB discovered the PCB soil contamination during a site inspection. EPA added the Site to the NPL in 1983. Surface and subsurface soils contained PCBs at concentrations up to 4,800 milligrams per kilogram (mg/kg). The concrete slab of the former casting plant was impacted with PCB concentrations of up to 5,400 mg/kg. These values exceeded the 10 mg/kg level that EPA established in 1988 as the national cleanup level for PCBs in non-restricted residential soils. In 1986, volatile organic compounds (VOCs), primarily trichloroethylene (TCE), vinyl chloride, and benzene, were detected in the groundwater beneath the Site.

The 1988 ROD addressed soil and groundwater as one Sitewide operable unit (OU). The selected remedy for the PCB contaminated soils was excavation and off-site disposal of soils contaminated above 10 mg/kg PCB. The soil remedy specified the following:

- Soils will be excavated to a depth of a least five feet for most of the contaminated portions of the Site, with limited areas being excavated down to 29 feet.
- Groundwater pumped from dewatering of deeper excavations will be treated to remove suspended sediment, PCBs, and VOCs.
- Excavated areas of the Site will be backfilled with clean soil which will meet a less than 1 mg/kg PCB criteria.
- The Site will then be fully regraded and seeded to ensure growth of grasses to minimize erosion.
- The implemented remedy will allow for unrestricted use (no institutional controls required).

The 1988 ROD remedy for the groundwater included further investigation to locate the source of the VOC contamination, installation of additional monitoring wells to evaluate the extent of VOC contamination, and ongoing groundwater monitoring for VOCs and PCBs. The ROD also called for the development and implementation of additional remedial measures, as necessary, to ensure that groundwater is restored to MCLs at the Site boundary.

In 1995, EPA issued an ESD that modified the original soil and groundwater remedies by allowing some PCB contaminated bedrock to remain on-site, imposing land use restrictions for those contaminated soil areas, and identifying monitored natural attenuation as the groundwater remedial measure. Specifically, PCB contaminated bedrock could remain in place where the bedrock contained less than 100 mg/kg PCB and was at least 15 feet below ground surface (bgs). A land

use covenant (LUC) signed by DTSC and the property owner was recorded on July 12, 1995 prior to the issuance of the ESD.

All buildings and related appurtenances were removed from the Site as part of the remedial action. The Site is completely enclosed by a chain link fence and is vegetated with grass except for the northeastern corner, which is covered by an asphalt pad that once served as a parking lot. Two concrete-lined drainage ditches exist just inside the eastern and southeastern perimeter fence line. The Site continues to be vacant; reasonably anticipated future land use would include commercial/industrial development or multi-unit residential building.

III. BASIS FOR THE DOCUMENT

Pursuant to CERCLA Section 121 and Section 300.430(f)(4)(ii) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), EPA completed the third Five-Year Review of the implemented soil and groundwater remedies and issued the Five-Year Review report on September 26, 2013.

In Section 6.4.1 of the Five-Year Review report, EPA screened the existing soil data and the ROD soil cleanup level of 10 mg/kg PCB against current (November 2012) EPA Regional Screening Levels (RSLs) to confirm whether the remaining soil concentrations, following the remedial action, were still protective of human health. The ROD soil cleanup level of 10 mg/kg is within the protective excess lifetime cancer risk range (0.22 to 22 mg/kg) for residential exposures. Excavation of all soils that exceeded the cleanup standard of 10 mg/kg PCB occurred at depths up to 15 ft bgs.

During the remedial action, the entire Site was divided into square grid cells 12.5 feet on each horizontal side by 2 feet vertically. Bedrock soil samples containing greater than 10 mg/kg PCB were located in only eleven[1] out of more than 900 grid cells. The eleven grid cells range in depth from 26 to 40 ft bgs and were all generally located in the central portion of the Site where the main excavation occurred. PCB concentrations in nine of the grid cells exceed the 22 mg/kg threshold for 1 x 10-4 excess cancer risk for residential exposure; however, the shallowest exceedance of this upper bound cancer risk threshold occurs at 26 feet bgs; the rest occur at depths of 30 feet bgs or greater. All sample grids except for one grid cell at 36 feet bgs have concentrations that are within the 1 x 10-4 excess cancer risk threshold for industrial soil (74 mg/kg).

Based on review of the post-excavation soil data, EPA determined that the onsite PCB contaminated soils, given their depth, are unlikely to pose an unacceptable risk to future residential use. EPA's evaluation showed that Site soils above 26 feet bgs are within the protective risk range for residential use and that deeper site soils above 36 feet bgs are within the protective risk range for a commercial/industrial use.

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[1] One additional grid cell had a measured soil concentration of 11.1 mg/kg at a depth of 14 feet, but was considered to have met the remedial goal of 10 mg/kg for PCBs because the measurement was within the calculated allowable limit of 11.8 mg/kg. 11.1 mg/kg is within the protective risk range for residential exposures.

The Site is currently vacant with the land zoned Service/Commercial. Adjacent property consists mainly of multi-unit residential buildings, office buildings, a hotel, fueling stations, and convenience stores. A reasonable reuse scenario would be light industrial with the possibility of excavation for utility lines, foundations and tanks. Another possible reuse scenario would be multi-unit residential buildings with possible excavation for underground parking, pool, as well as utilities and foundations. Under both these re-use scenarios, the maximum excavation would be about 10 feet. In addition, depth to water fluctuates between 3 feet below ground surface (bgs) to 15 feet bgs, making excavation greater than 15 feet highly unlikely. All soil shallower than 26 feet is safe for all and reasonably anticipated future land uses.

The residual PCB concentrations are at depths that would prevent exposures under reasonable re-use scenarios. EPA concluded that given the unlikelihood of contact with soils at these depths, land use restrictions are not necessary to achieve protectiveness.

IV. DESCRIPTION OF SIGNIFICANT DIFFERENCES

Based on a re-evaluation of potential risks to human health and the environment during the 2013 five year review process, EPA has determined that land use restrictions are no longer needed to achieve protectiveness at the Site. EPA is issuing this ESD to remove the requirement for land use restrictions for the Superfund remedy at the Site. This ESD does not affect the current groundwater remedy, monitored natural attenuation.

On March 25, 2016, a LUC signed by RWQCB and the property owner was recorded to replace the 1995 LUC that was signed by DTSC and the property owner. DTSC will need to prepare and record a release to remove the 1995 LUC. EPA has determined that no land use restrictions are needed for the Superfund remedy and will not be incorporating the 2016 LUC into the Superfund remedy.

V. SUPPORT AGENCY COMMENTS

As required by 40 C.F.R 300.515(h)(3), EPA provided DTSC and RWQCB an opportunity to review and comment on the ESD. RWQCB had no comments per an email dated August 1, 2016. DTSC concurred with the ESD in a letter dated August 3, 2016.

VI. STATUTORY DETERMINATIONS

The modification to the 1988 ROD and 1995 ESD as documented in this ESD does not fundamentally change the selected Site remedy. The selected remedy continues to attain the mandates of Section 121 of CERCLA, 42 USC §9621, and the NCP, and continues to meet ARARs pursuant to 40 CFR §§300.430(f)(1)(ii)(B)(1)-(2). Specifically, the remedy is protective of human health and the environment, complies with Federal and State requirements that are applicable or are relevant and appropriate to the remedial actions, is cost effective, and utilizes permanent solutions and resource recovery technologies to the maximum extent possible.

VII. PUBLIC PARTICIPATION

Pursuant to 40 C.F.R. § 300.435(c)(2)(i), a formal public comment period is not required for an ESD to a ROD when the difference does not fundamentally alter the remedial actions with respect to scope, performance or cost. This ESD does not propose a fundamental change to the remedy as described in the 1988 ROD and 1995 ESD with respect to scope, performance or cost; therefore, no formal public comment period is required. As required by the NCP, 40 C.F.R. § 300.435(c)(2)(i), EPA will publish a public notice in the local newspaper and will make this ESD and supporting information available for public review through the Administrative Record and information repository for the Site.

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Superfund Division, Region 9
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September 16, 2016
Date